

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
FAYETTEVILLE DIVISION
CASE NO: 17-05046-5-JNC**

IN RE:

JUNE CAROL GOODWIN

Debtor(s)

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)
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CHAPTER 13

MOTION TO MODIFY CHAPTER 13 PLAN

Debtor(s) June Carol Goodwin hereby moves the Court to modify the Chapter 13 plan payments. In support thereof, Debtor(s) shows the Court as follows:

1. That the Debtor filed a Chapter 13 Bankruptcy petition on October 13, 2017.
2. The Debtor is elderly and she is struggling financially and she needs to extend her plan to the full 60 months.
3. That the Chapter 13 plan payments should be modified as follows: twenty-seven (27) payments at \$1063.00 then thirty-three (33) payments at \$1,263.00.

WHEREFORE, THE DEBTOR(S) MOVES THE COURT FOR THE FOLLOWING:

4. That the plan payments be modified to twenty-seven (27) payments at \$1063.00 then thirty-three (33) payments at \$1,263.00.
5. That the Court require any other measure it deems necessary.

This the 28th day of January, 2020.

/s/Chad W. Hammonds
Attorney for Debtor(s)
3410 Capuano Road
Lumberton, NC 28360
(910) 608-3425
State Bar No.: 21027

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
FAYETTEVILLE DIVISION

IN THE MATTER OF:

Case No: 17-05046-5-JNC

JUNE CAROL GOODWIN
DEBTOR (S)

Chapter: 13

NOTICE OF MOTION AND CERTIFICATE OF SERVICE

TO: THE CREDITOR (S), TRUSTEE AND OTHER PARTIES IN INTEREST

NOTICE IS HEREBY GIVEN of the Debtor's Motion to Modify the Plan.

FURTHER NOTICE IS HEREBY GIVEN that if you fail to Respond or otherwise Plead or Request a Hearing in writing within 21 days from the date of this Notice, the relief requested in the Motion may granted without further hearing or Notice; and

FURTHER NOTICE IS HEREBY GIVEN that if a Response and a Request for a Hearing is filed by the Trustee, or other parties in interest named herein in writing within the time indicated, a Hearing will be conducted on the Motion and Response thereto at a date, time and place to be later set by the Court and all interested parties will be notified accordingly.

DATE OF NOTICE: January 28, 2020.

/s/Chad W. Hammonds

Chad W. Hammonds

Attorney for Debtors

3410 Capuano Road

Lumberton, NC 28360

(910) 608-3425

State Bar No. 21027

CERTIFICATE OF SERVICE

I, Chad W. Hammonds, Attorney at Law, of 3410 Capuano Road, Lumberton, North Carolina 28360, certify:

That on January 28, 2020 I served the following individuals listed on the attached sheet.

"SEE ATTACHED MAILING MATRIX"

Also, I served the below Chapter 13 Trustee by CM/ECF electronic mail:

Joseph A. Bledsoe III
Chapter 13 Trustee
P. O. Box 1618
New Bern, NC 28563

I certify under penalty that the foregoing is true and correct.

This the 28th day of January, 2020.

/s/Chad W. Hammonds
Chad Wyatt Hammonds
Attorney for Debtors
3410 Capuano Road
Lumberton, NC 28360
(910) 608-3425
State Bar No. 21027